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Counsel for Plaintiff Lisa Vizcarra and the Proposed Class

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

LISA VIZCARRA, individually, and on
behalf of those similarly situated,

Plaintiff,

v.

UNILEVER UNITED STATES, INC.,

Defendant.

Case No. 4:20-cv-02777-YGR

DECLARATION OF MICHAEL R. REESE IN
SUPPORT OF
PLAINTIFF'S ADMINISTRATIVE
MOTION FOR LEAVE TO
ELECTRONICALLY FILE DOCUMENTS
UNDER SEAL PURSUANT TO CIVIL
LOCAL RULE 79-5

Date: N/A

Time: N/A

Place: Courtroom 1, 4th Floor

Judge: Honorable Yvonne Gonzalez Rogers

Pursuant to 28 U.S.C. § 1746, I, Michael R. Reese, declare as follows:

1. I am a partner at the law firm of Reese LLP, which is co-counsel for Lisa Vizcarra, the plaintiff in the above-captioned action (“Plaintiff”).

2. I am a member in good standing of the bars of the States of California and New York, as well as the bars of the the United States District Courts for the Northern District of California, Southern District of California, Central District of California, and, Eastern District of California among other federal bars.

3. I submit this declaration in support of Plaintiff’s Administrative Motion for Leave to Electronically File Documents under Seal Pursuant to Civil Local Rule 79-5, filed concurrently herewith.

4. The facts set forth in this declaration are based on personal knowledge, and I could competently testify to them if called upon to do so.

5. The Court entered a Stipulated Protective Order governing, among other things, designation and filing of confidential, proprietary, or private information in the above-captioned action on September 3, 2020. *See* Stipulated Protective Order ECF No. 37.

6. During discovery in this case, Plaintiff served Defendants with interrogatories and document requests (“Discovery Requests”).

7. In response to Plaintiff’s Discovery Requests, Defendant interrogatory responses and documents that Defendant designated as CONFIDENTIAL.

8. For the reasons given above, Plaintiff seeks to file the following documents and information under seal pursuant to Civil Local Rule 79-5:

<u>DOCUMENT</u>	<u>PORTION SOUGHT TO BE SEALED</u>
Motion for Class Certification and	Page 3, lines 6-8
Memorandum of Law in Support Thereof	Page 4, lines 10-11
	Page 5, line 11

1	Exhibit B to the Declaration of Michael R.	Entirety
2	Reese, which is Defendant's Responses to	
3	Plaintiff's First Set of Interrogatories and	
4	which Defendant has marked as confidential	
5	Exhibit C to the Declaration of Michael R.	Entirety
6	Reese, which is Defendant's First Supplement	
7	Response to Plaintiff's Interrogatories 1, 3,4,	
8	10 and 13 and which Defendant has marked	
9	as confidential	
10	Exhibit D to the Declaration of Michael R.	Entirety
11	Reese, which is Defendant's First Supplement	
12	Response to Plaintiff's Interrogatories 8 and 9	
13	and which Defendant has marked as	
14	confidential	
15	Exhibit E to the Declaration of Michael R.	Entirety
16	Reese, which are Defendant's sales figures	
17	that Defendant produced in discovery and	
18	marked as confidential	

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

REESE LLP

By: /s/ Michael R. Reese

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